

Plan Tucson FINAL Draft - Comments Received **Written Comments Received regarding Plan Tucson Final Draft**
s:/planning/plantucson/public participation/2013/Plan Tucson 3-20-13/comments received & responses/comments received 5-20-13.xls
3/20/2013

#	Type of Comment	Topic	Final Draft Page or Chapter #	Final Draft Goal or Policy #	Comment	Commenter's Name	Commenter's Affiliation	Method received	Date received
1	Formatting/spelling/typos/grammar	Historic Preservation		Opportunity Areas Map	Thank you to the whole team for all the great work you've put into this plan. I have only a few minor comments. 1. Exhibit HP-2 shows Rincon Heights Historic District as pending when in fact it was recently finalized (Feb 2013).	Colby Henley	Rincon Heights	E-mail	3/22/2013
2	Adding new text/goal/policy	Land Use, Transportation, & Urban Design		Opportunity Areas Map	2. Exhibit LT-7 (Opportunity Areas) - I would like to see a Neighborhood Center added to the section of Park Ave between 9th Street down to 13th Street - much of this area already has a mix of commercial and residential, but also some empty parcels that could be developed/enhanced.	Colby Henley	Rincon Heights	E-mail	3/22/2013
3	Formatting/spelling/typos/grammar	Land Use, Transportation, & Urban Design		Opportunity Areas Map	Also, the legend shows the yellow line for intercity rail and green for the streetcar - looks like yellow might be the streetcar.	Colby Henley	Rincon Heights	E-mail	3/22/2013
4	Changing language in policy	Land Use, Transportation, & Urban Design		LT18	Thank you for including the Valencia Rd. extension east of Houghton on the Opportunities Map (dashed line Future Roads), especially since this has 100% ROW acquired and 100% Construction Plans approved by Pima County and City of Tucson Transportation Departments. When this came up, our request included the map and a clarification of LT Policy #13 so that it was clear that the "refined planning requirement" in the policy did not apply to the construction of Valencia Rd. east of Houghton. In the Final Draft, the Policy is still included and unchanged. It is now LT18. The LT18 Policy Reads: "Consider new development or the extension of major infrastructure in the Houghton Area only after additional, more refined planning efforts are completed." We would like Plan Tucson to be clear that the construction and extension of Valencia Rd in the Houghton Area can proceed, and the City of Tucson will not expect it to be predicated on completing more refined planning efforts. I understand that other development or infrastructure sizing in the area may need additional planning, but Valencia Rd. east extension's planning, design and final construction plans are done relative to: State Land, City of Tucson and Pima County. Is there something additional that I should do? Thank you.	Priscilla Storm, Vice-President	Diamond Ventures, Inc.	E-mail	3/25/2013
5	Adding new text/goal/policy	Land Use, Transportation, & Urban Design		Opportunity Areas Map	I am providing a map on State Trust Land parcels identified on the Department's 5 Year Plan that are not designated as Plan Tucson Opportunity Area Map. Map located under s:/plan tucson/public participation program/final draft 3-20-13/Comments received and responses/E-mails/State Trust Land 5 Year Plan parcels _ Plan Tucson.pdf	Tim Bolton	Arizona State Lands Department	E-mail	3/22/2013
6	Changing background text	Energy & Climate Readiness	3.62		p. 3.62: Referring to the City of Tucson Greenhouse gas emissions for 2010 report says: "Total greenhouse gas emissions in Tucson were 7,064,269 million metric tons in 2010, with transportation and residential energy accounting for 30% each of the total (Exhibit EC-1)." Either use 7.1 million metric tons or use 7,064,269 metric tons of greenhouse gas. The way it is stated grossly over estimates the amount produced by the city, as stated in PAG's report. http://www.pagnet.org/documents/Air/GreenHouseGas-2012-Inventory.pdf	Susanne T. Cotty	Pima Association of Governments (PAG)	E-mail	4/2/2013
7	Changing background text	Energy & Climate Readiness	Exhibit EC-2		Also, what is the scale of the y axis in Figure EC-2? I feel it would be more informative with numbers on the 'y' axis.	Susanne T. Cotty	Pima Association of Governments (PAG)	E-mail	4/2/2013
8	Changing language in policy	Sign Code			At the March 21, 2013 regular meeting of the Citizen Sign Code Committee (CSCC) the committee voted 6 to 1 to request that the FINAL DRAFT of Plan Tucson be revised to delete language proposed by staff that inaccurately restates and/or conflicts with existing "actions" within the General Plan previously adopted by Mayor and Council. Specifically, within General Plan Element 4: Community Character and Design, Action 4.8.C, Action 4.8.D, and Action 4.8.E have been rewritten in Plan Tucson as Review Guidelines LT26.1.6, LT26.1.4, and LT26.1.5. A comparison of the language of each is attached for reference.	George Holguin, Chair	Citizen's Sign Code Committee	Letter	3/29/2013
9	Changing language in policy	Sign Code			The General Plan actions as they exist today are integral to Community Character and Design Policy 4: "Design and maintain streets to enhance their overall function and aesthetic quality." For reasons that were not explained to the CSCC, this policy and Supporting Policy 4.8 "Promote the improvement of the quality and effectiveness of sign regulation, standards, and administration." are not included Plan Tucson. The decision to retain and edit the policy actions without retaining the broader policies they support is a structural issue that is beyond the scope of this letter but nevertheless should be examined. The CSCC's specific concerns address the proposed changes to the existing language of General Plan Element 4: Community Character and Design, Action 4.8.C, Action 4.8.D, and Action 4.8.E.	George Holguin, Chair	Citizen's Sign Code Committee	Letter	3/29/2013

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10	Changing language in policy	Sign Code			The proposed changes are clumsy and unnecessary. The proposed changes to Action 4.8.E (as stated in Review Guideline LT26.1.5) are especially problematic in that they represent a reversal of existing policy prohibiting the relocation of nonconforming signs. Mayor and Council reaffirmed their support for the existing policy with the adoption of Ordinance No. 10954 on January 10, 2012. Ordinance No. 10954 prohibits the relocation of all nonconforming signs (not just those along roadway and other public works projects) beginning July 10, 2013. A copy of Ordinance No. 10954 is attached for reference. The existing actions from the General Plan which address sign issues (Action 4.8.C, Action 4.8.D, and Action 4.8.E) can and should be preserved verbatim within Plan Tucson to ensure consistent policy direction is maintained and to reduce the possibility of unintended consequences.	George Holguin, Chair	Citizen's Sign Code Committee	Letter	3/29/2013
11	Changing language in policy	Process			The structural problems and dramatic changes to existing Mayor and Council policy may be an indication of a process that is being unduly rushed. Similar errors of translation or reduction may be lurking elsewhere in the document. Staff informed the CSCC that the language of Plan Tucson must be approved by Mayor and Council by June 25, 2013 in order to be placed on the November 2013 ballot. CSCC urges the members of the Planning Commission to carefully vet any and all changes to the policy documents guiding Tucson into the future, and to insist that the time to do so be made available prior to forwarding Plan Tucson to Mayor and Council. Thank you for your careful consideration of our requests. (Please see attached Ordinance 10954.)	George Holguin, Chair	Citizen's Sign Code Committee	Letter	3/29/2013
12	Policies/Background	DMAFB & Airport Zones			At Wednesday night's Mayor and Council meeting, nineteen of Tucson's neighborhood associations and homeowners' associations presented a letter to the Mayor and Council members. The letter expresses the associations' deep concern about the Air Force's plan to base F-35s at Tucson International Airport. A copy of the letter is attached. Signatures of the associations' leaders are also attached. Here are just two of the concerns that the associations express in their letter: First: The Air Force's Environmental Impact Statement, which analyzed the impacts of the F-35s on Tucson, concluded the noise of F-35s will be so loud that it will render the homes of more than 8,000 Tucson residents "not compatible with residential use." Second: The Air Force studied a representative sample of Tucson's schools, medical facilities, and churches that will be impacted by F-35 noise. The Air Force concluded that, when F-35s fly over these schools, medical facilities, and churches, they will be so noisy that, on average, conversations will be interrupted between eight and thirteen times per hour (depending upon whether windows are closed or open). Mr. Miranda, please note that nearly all the facts in the associations' letter come directly from Air Force and Department of Defense documents. The letter concludes with an e-mail address that will provide the source for each fact, and will answer all other relevant questions.	Gary A. Hunter; Les Pierce-Arroyo Chico NA; Sarah Harris-Feldman's NA; Ivo Ortiz-Barrio Centro NA; Bob Schlanger-Jefferson Park NA; Steve Morrison-Blenman-Elm NA; Mark Mayer-Julia Keen NA; Mary Terry Schiltz-Broadmoor Broadway Village NA; Colby Henley-Rincon Heights NA; Bill DuPont-Colonia Solana HA; John O'Dowd-Sam Hughes NA; Frank Babb-EI Encanto Estates HA; Ivey Schwartz-Tucson Mountain Assoc.; Brian Flagg-Santa Rita Park NA; Chris Gans-West University NA; John D. Burr-Armory Park NA; Ian Fritz-Dunbar Spring NA; Ted Warmbrand-Barrio San Antonio NA; Pedro M. Gonzales-Barrio Viejo NA;		Hard Copy	3/27/2013

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13	Policies/Background	DMAFB & Airport Zones			<p>The Boards of Directors of these nineteen neighborhood associations urge the Mayor and Council Members to carefully consider the impacts that the Air Force's F-35A aircraft will have upon the residents of Tucson. A total of 72 F-35As will replace a smaller number of F-16s that are currently based at TIA. The new aircraft will be much louder than the F-16s.</p> <p>How much louder? The Air Force's Draft Environmental Impact Statement (DEIS) uses theoretical, computer-generated numbers to conclude the F-35As will be about twice as loud. However, actual noise measurements, which the Air Force used in its EIS for Eglin AFB, show the F-35As are four times as loud as the F-16s.</p>	<p>Gary A. Hunter, Les Pierce-Arroyo Chico NA; Sarah Harris-Feldman's NA; Ivo Ortiz-Barrio Centro NA; Bob Schlanger-Jefferson Park NA; Steve Morrison-Blenman-Elm NA; Mark Mayer-Julia Keen NA; Mary Terry Schiltz-Broadmoor Broadway Village NA; Colby Henley-Rincon Heights NA; Bill DuPont-Colonia Solana HA; John O'Dowd-Sam Hughes NA; Frank Babb-EI Encanto Estates HA; Ivey Schwartz-Tucson Mountain Assoc.; Brian Flagg-Santa Rita Park NA; Chris Gans-West University NA; John D. Burr-Armory Park NA; Ian Fritz-Dunbar Spring NA; Ted Warmbrand-Barrio San Antonio NA; Pedro M. Gonzales-Barrio Viejo NA;</p>		Hard Copy	3/27/2013
14	Policies/Background	DMAFB & Airport Zones			<p>Using the theoretical-and not actual-decibel levels, the DEIS concludes that the F-35As noise will render the homes of more than 8,000 residents of Tucson "not compatible with residential use." (That phrase--"not compatible with residential use"--is used by the Department of Defense, the Department of Housing and Urban Development, and the Federal Aviation Administration to characterize properties that are subjected to a noise level of 65 dB DNL or greater.) Arizona Revised Statutes impose severe restrictions on any property that is "not compatible with residential use." The DEIS lists fifteen of Tucson's schools, medical facilities, and churches that will be heavily impacted by F-35A noise. The DEIS acknowledges that additional institutions may be heavily impacted; the list is merely "representative," and "is not intended to include all ... schools, hospitals or places of worship." When F-35As fly over these fifteen "representative" institutions, their noise will be so loud that, on average, conversations will be interrupted between eight and thirteen times per hour (depending upon whether windows are closed or open). Imagine how this will affect a doctor who tries to communicate with a patient, how it will affect a classroom of students who attempt to hear their teacher, how it will affect a congregation that tries to listen to a minister's sermon. Many studies show that, when students are impacted by aircraft noise, they do poorly in school. They have greater difficulty learning to read, processing information, and remembering facts. Their poor academic performance will handicap them for the rest of their lives. The Department of Defense recognizes that students with English as a second language are among those who are most susceptible to the impacts of noise. And of the Tucson residents who will be most heavily impacted by F-35A noise, 88.2 percent are minorities. For many of the minority students, English is a second language. Their performance in school will be especially affected by the noise.</p>	<p>Gary A. Hunter, Les Pierce-Arroyo Chico NA; Sarah Harris-Feldman's NA; Ivo Ortiz-Barrio Centro NA; Bob Schlanger-Jefferson Park NA; Steve Morrison-Blenman-Elm NA; Mark Mayer-Julia Keen NA; Mary Terry Schiltz-Broadmoor Broadway Village NA; Colby Henley-Rincon Heights NA; Bill DuPont-Colonia Solana HA; John O'Dowd-Sam Hughes NA; Frank Babb-EI Encanto Estates HA; Ivey Schwartz-Tucson Mountain Assoc.; Brian Flagg-Santa Rita Park NA; Chris Gans-West University NA; John D. Burr-Armory Park NA; Ian Fritz-Dunbar Spring NA; Ted Warmbrand-Barrio San Antonio NA; Pedro M. Gonzales-Barrio Viejo NA; Michael Burkholder</p>		Hard Copy	3/27/2013

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15	Policies/Background	DMAFB & Airport Zones			<p>The DEIS analyzes only the noise impacts of F-35As in the vicinity of TIA. However, the Air Force has separately acknowledged that the F-35As will also fly over the central city on some arrivals at TIA. In addition, they will fly in and out of Davis-Monthan. D-M's flight paths will take the F-35As directly over the most densely populated area of Tucson, which includes various schools, the University of Arizona, the University Medical Center, Reid Park, and the residential neighborhoods of midtown Tucson. The F-35As will bring some economic benefits to Tucson. When the F-16s are displaced and the F-35As are bedded at TIA, they will--according to the DEIS--create a net gain of 351 military and civilian jobs. (To put this in perspective, a recent article in the Arizona Daily Star stated that eight local McDonald's franchises employ a total of 350 people.) The F-35As will also bring construction contracts and construction employment. However, the DEIS cautions that the construction jobs "would constitute less than 1 percent of the total employment in Pima County." Further, "Construction expenditures and the jobs created would be temporary." In contrast, our local leisure and hospitality businesses add \$1.4 billion annually in direct economic impacts to our economy. If the noise of F-35As drive even a fraction of Tucson's visitors from our 39 golf courses, from our resorts and hotels and motels, from Reid Park Zoo and the Arizona-Sonora Desert Museum, the economic damage will be far greater than the economic benefits the F-35As will bring. Even greater is the damage that F-35As noise will inflict on our property values. Property values fall by 1.33% for each decibel of aircraft noise, one study shows. Another study concludes that property values drop by more than 25% due to aircraft noise. Can the residents of Tucson afford to take such a hit on the values of their properties? Can the City of Tucson afford to take a similar hit on property-tax revenues? The Tucson-based F-35As will be used solely for training pilots. The pilots will take their very first F-35A flights in these aircraft. Over the roofs of our residential neighborhoods, these pilots will learn how to fly the F-35As. The F-35As have proven to be very unsafe aircraft. To date, the Air Force permits only experienced test pilots to fly them, and only in certain prescribed flights. Already, the aircraft have suffered major mechanical, structural, and software failures. The Air Force is trying to rectify these problems, but admits that it will "start training activities with a less mature aircraft system than planned." ("Mature" is an industry euphemism for "safe and reliable.") So the Air Force intends to fly "immature" F-35As over our residential neighborhoods, with pilots who are just beginning to learn how to fly them. Mr. Mayor and Council Members, is this what you want for Tucson?</p> <p>For the sources of the facts above, contact brickmattress@gmail.com</p>	Gary A. Hunter, Les Pierce-Arroyo Chico NA; Sarah Harris-Feldman's NA; Ivo Ortiz-Barrio Centro NA; Bob Schlanger-Jefferson Park NA; Steve Morrison-Blenman-Elm NA; Mark Mayer-Julia Keen NA; Mary Terry Schiltz-Broadmoor Broadway Village NA; Colby Henley-Rincon Heights NA; Bill DuPont-Colonia Solana HA; John O'Dowd-Sam Hughes NA; Frank Babb El Encanto Estates HA; Ivey Schwartz-Tucson Mountain Assoc.; Brian Flagg-Santa Rita Park NA; Chris Gans-West University NA; John D. Burr-Armory Park NA; Ian Fritz-Dunbar Spring NA; Ted Warmbrand-Barrio San Antonio NA; Pedro M. Gonzales-Barrio Viejo NA; Michael Burkholder		Hard Copy	3/27/2013
16	General	Star Community Rating System	44		<p>I would like to see some language included from the Star Community Rating System, version 1, page 44, specifically the items below. I have added some of my own wording as well (in parentheses):</p> <ol style="list-style-type: none"> 5. Support (and fund) neighborhood advisory councils to encourage dialogue on community issues and build the social capital of neighborhoods 6. (Adequately fund) a department with (enough) staff to work as liaisons with (individual) neighborhoods 7. Provide direct funding and management of at least 2 types of community and neighborhood venues 8. Provide capacity-building programs to enable community leaders and groups to self-organize, resolve issues, and cultivate leadership (re-fund Pro Neighborhoods, for example) 	Joan Hall	Jefferson Park Neighborhood Association	Web	4/12/2013
17	General	DMAFB			<p>The Military Community Relations Committee (MCRC) is comprised of a group of individual volunteers, representing varied perspectives and interests. MCRC receives information from and provides feedback to DMAFB and local governments. For years, the MCRC, and its predecessor organization MC3, have met regularly to discuss the interface between military base operations and over flights and the existing and future residents and businesses. Davis Monthan Air Force Base and its associated missions comprise a significant presence in the City of Tucson and our greater regional community. We continue to be interested in and review issues that can affect and improve this relationship.</p> <p>Prior to the MCRC, during the MC3 environmental mediation process and the development of the Final Report and Consensus Recommendations, the importance and relevance of plan amendments in Tucson and Pima County was noted in the Land Use and Regulatory Sub-Committee recommendations. Given the influence of DMAFB on greater Tucson, it is appropriate for its presence and the importance of compatibility to be acknowledged throughout Plan Tucson.</p> <p>We appreciate the opportunity to provide our important and relevant perspective on this essential planning document. We understand that the City of Tucson Planning Commission has reviewed the draft of Plan Tucson, and City staff has received numerous comments and inputs which have been incorporated into a final draft of Plan Tucson that was made available to the public in March. This letter provides input for consideration and inclusion in Plan Tucson prior to Mayor and Council consideration.</p> <p>After review of Arizona Revised Statutes and the Tucson General Plan, Plan Tucson, we recommend that Plan Tucson inventory, analysis, policies and programs including maps and text be made more consistent with the ARS requirements, some of which we have included at the close of this letter. A few illustrative examples include:</p>	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
18	Inventory, analysis, policies & programs	DMAFB	LT-5	3.117	<ul style="list-style-type: none"> • The map in Plan Tucson does not show the Accident Potential Zones for Davis Monthan Air Force Base on Exhibit LT-5 Airport Environs Overlay Zone page 3.117 	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
19	Inventory, analysis, policies & programs	DMAFB	GI-2	3.76 & 3.77	<ul style="list-style-type: none"> • Future open space designated to prevent encroachment and to guide compatible land uses in support DMAFB current and future operations is not shown on Exhibit GI-2 Parks, Washes, Trails and Open Space page 3.74 or on Exhibit GI-3 Habitat Conservation Plan Areas (review legend for accuracy) on page 3.76 or referenced in The Natural Environment Policies on page 3.77 	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013

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20	Inventory, analysis, policies & programs	DMAFB	Chapter 2		• In Chapter 2, which discusses The Planning Context; the importance of neighborhoods is highlighted, but the significant relationship shared between DMAFB and the neighborhood associations, neighborhoods, and homeowners associations in the City of Tucson is not mentioned. These residential neighborhoods are impacted to varying degrees by flights over Tucson. Plan Tucson mentions the City's 2012 Poverty and Urban Stress Report, but no statistics or map is included. Potential redevelopment opportunities which might mutually benefit neighborhoods and DMAFB are not identified.	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
21	Inventory, analysis, policies & programs	DMAFB	Chapter 3		• The Housing Policies in Chapter 3 do not address the importance of a compatible relationship between the 230,906 housing units, including the 50.2% that are renters and the Base. Also, the importance to DMAFB of defining areas where there should be no new housing or extremely low density residential is missing.	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
22	Inventory, analysis, policies & programs	DMAFB	Exhibit RR-1	3.105	• Exhibit RR-1 Redevelopment Plans in Tucson found on page 3.105 in the Redevelopment and Revitalization Chapter does not identify those residential areas impacted by the 70-74 Land and the Accident Potential Zone 1 which warrant planning analysis and consideration.	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
23	Inventory, analysis, policies & programs	DMAFB		3.25	• The Public Safety Policies found on page 3.25 do not mention the role and service provided by DMAFB. The importance of local planning decisions on improving the public safety interface between DMAFB and our community is not mentioned in Plan Tucson.	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
24	Inventory, analysis, policies & programs	DMAFB		3.33	• Plan Tucson in Public Health Policies page 3.33 acknowledges the relationship between the built environment and public health, and the importance of regulation to protect the health, safety and welfare of the general public through the separation of residential and industrial land uses. Plan Tucson should note the importance of the spatial relationship between local business, residential and military land uses, as well as, the relationship between ongoing quality-of-life activities associated with residents and guests in Tucson and the daily operational flight activities associated with the Base.	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
25	Inventory, analysis, policies & programs	DMAFB			As a community that both values our military facilities and understands the impacts of military aircraft over flights on populated areas, the MCRC realizes the importance of planning, developing and managing land uses and associated activities. The future sustainability of the urban core of Tucson and the future viability of DMAFB can be improved and enhanced by the planning policies defined in Tucson's General Plan. Plan Tucson has an opportunity to show a strong planning commitment to this important community dynamic. MCRC believes in the compatible, economic development of lands in the vicinity to DMAFB. Rather than indicating that there are no plans for this area in the next 10 years; Plan Tucson should address the planned compatible growth within the southeast vacant lands of Tucson. The Tucson Technology Corridor, University of Arizona Tech Park, and the economic development / jobs corridor and 1-19 to 1-10 bypass should be incorporated within Plan Tucson. Plan Tucson should anticipate locations and land use categories in the vacant lands within its incorporated boundaries which could support a variety of other economic development opportunities. Future economic development in these areas could contribute to the community and support and balance the economic contributions of military operations in our City. Below are some of the relevant sections of ARS 9-461-05 Cities and Towns; General Plans; authority; scope; which	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
26	Inventory, analysis, policies & programs	DMAFB & Airport/Land Use			• Statement of Community Goals and Development Policies; Maps and any Necessary Diagrams; Text setting forth objectives, principles, standards and plan proposals. • Land Use Element o Designations/distributions/locations/extent of land for housing, business, industry, open space, etc. as may be appropriate to the municipality o Recommended standards of population density/building intensity o Specific programs/policies/locations that may be used to promote infill and compact form development o Consideration of air quality and access to solar energy for all general land use categories o Includes policies maintaining a broad variety of land uses, including the range of uses existing in the municipality when the plan is adopted, readopted or amended o For cities in the territory in the vicinity of a military airport or ancillary military facility as defined in ARS28-8461 include consideration of military airport or ancillary military facilities ... Identify boundaries of the high noise or accident potential zone for purposes of planning compatible land uses in high noise or accident potential zone that are compatible with military operations • Circulation element with general location and extent of existing and proposed freeways, arterial and collector streets, bicycle routes and other modes of transportation, correlated to the land use element.	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013

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27	General	Required Elements			<p>For Cities with a population of 10,000 or more, the general plan shall include:</p> <ul style="list-style-type: none"> •Open space element/inventory or open space & recreation uses/analysis of forecasted needs, policies for managing and protection open space and implementation strategies to acquire additional open space areas/policies to promote regional system of integrated open space and rec uses •Growth area element/identification of areas particularly suitable for planned multimodal and infrastructure to support planned concentration of residential, commercial tourism uses •Environmental planning element that contains community wide applicable analyses, policies, and strategies to address the anticipated effects if any on air, water, natural resources associated with proposed development under the plan, but shall not require and EIS <p>For Cities with a population of 50,000 or more, the general plan shall include:</p> <ul style="list-style-type: none"> •Conservation element •Recreation element •Circulation element in addition to above - including parking facilities, setback requirements and delineations for such, street naming and house numbering •Public services and facilities element / police, fire, emergency services, sewage, refuse disposal, drainage, local utilities, rights of way, easements and facilities for them •Public buildings element/civic and community centers, public schools, libraries, police and fire stations •Housing element/standards and programs for the elimination of substandard dwelling conditions for the improvement of housing quality, variety and affordability and for the provision of adequate sites for housing. This elements shall contain analysis of existing and forecasted housing needs with equal provisions for housing of all segments of community regardless of race, creed, economic level •Conservation, rehabilitation and redevelopment elements consisting of plans and programs for the elimination of slums and blighted areas, community redevelopment including housing, business, industrial and public building sites •Safety element for the protection of the community from natural and artificial hazards 	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
28	General	Neighborhood Preservation			<p>•Neighborhood preservation and revitalization element/programs that promote home ownership, provide assistance for improving appearance of neighborhoods, promote maintenance of commercial and residential buildings in neighborhoods, programs that provide for the safety and security of neighborhoods</p> <p>We thank you for the opportunity to provide comments on Plan Tucson. The MCRC hopes that the City of Tucson finds them constructive. We look forward to their inclusion in the Plan Tucson document.</p>	Alice Roe, Chair	Military Community Relations Committee	Hard Copy	4/5/2013
29	Background	Economic Development			As I have previously recommended, the Economic Development section should contain a chart comparing Tucson's poverty rate with that found in other Southwestern cities. The chart I provided to the Planning Commission on April 3 showed Tucson with the highest rate of poverty among seven cities and it is the one I suggest be included in the plan.	Dave Devine		Web	4/22/2013
30	Background	Socio Economic	Page 2		For 2011, the U.S. Census Bureau showed 37-percent of Tucson's children live in poverty. That figure is both regrettable and a result of local policy dating back at least to the 1960s. To include a goal statement in the plan of "A community where no one lives in poverty" is both unrealistic and reflects the long-standing "pie-in-the-sky" attitude of many local officials. The statement should be removed.	Dave Devine		Web	4/22/2013
31	Changing language in policy	Landscape & Annexation	3.127	LT20	<p>I believe the language leaves the impression of strict interpretation of the CLS, and further I believe this will have a negative impact on potential annexations. I suggest the following modified language would allow for an independent assessment of the CLS and how it applies to the specific property in question and would allow for alternative solutions to the designation. That language, which is similar to that in LT21, is the following:</p> <p>CONSIDER THE APPLICATION OF THE PIMA COUNTY CONSERVATION LAND SYSTEM MAP AND ASSOCIATED GUIDELINES TO FUTURE ANNEXATIONS.</p>	Michael Marks	MJM Consulting	Web	4/25/2013
32	Changing language in policy	Historic Preservation & Cultural Resources	Chapter 3	HP-1 through HP-8	At the request of City of Tucson (COT), staff from the Office of Sustainability and Conservation (OSC) conducted inter-jurisdictional review for cultural resources of the revised COT document, Final Draft Plan Tucson: City of Tucson General & Sustainability Plan 2013 (Plan Tucson). The revised draft Plan Tucson is currently open to public review prior to final review and adoption. The revised document incorporates previously submitted public comments and comments from other governmental agencies and nongovernmental organizations. Plan Tucson replaces the General Plan adopted in 2001 in response to the requirements of State law that jurisdictions revisit their existing general plans every ten years and either readopt that plan or adopt a new plan. COT has prepared a new plan, focused on long-term policy to guide decisions affecting "elements that shape the city, such as housing, jobs, land use, transportation, water, and energy resources" (pp. 1.1 – 1.2). Plan Tucson is intended to be used in conjunction with other long-range plans, policies, specific plans and regulations that affect development. The following comments reflect OSC observations and concerns about how Plan Tucson addresses Historic Preservation issues and Cultural Resources protections (archaeological and historic sites).	Linda Mayro & Loy Neff	Sustainability & Conservation	E-mail	4/18/2013

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33	Changing language in policy	Historic Preservation & Cultural Resources	Chapter 3	HP-1 through HP-8	<p>OSC appreciates that Plan Tucson provides discussion of Historic Preservation issues based on input from the COT Historic Preservation Office. Chapter 3, The Built Environment, discusses the increase in numbers of historic homes in Tucson (50 years old or older), especially over the last decade, and establishes a context for historic preservation that equates historic "status" to enhanced property values, an assertion supported by several cited studies in COT and other jurisdictions across the U.S. The discussion provides background to the development of Historic Preservation goals that are expressed in policies HP-1 through HP-8 (p.3.93). The Historic Preservation discussion in Chapter 3 is intended to guide preservation initiatives and provide incentives directed at historic homes, commercial buildings, and historic districts and preservation zones, to enhance property values. Plan Tucson outlines technical and financial assistance to owners of Historic Properties and Historic neighborhoods. This approach redefines historic properties as economic assets, assigning secondary importance to historical significance and integrity in a development model that uses historic preservation to promote economic benefit. OSC recognizes the economic value of Historic Properties and agrees that resulting improvements to historic properties would be beneficial, but we note with concern the reprioritization of core Historic Preservation values and the lack of consideration of how to protect non-renewable archaeological sites. Challenges to Historic Preservation policies are noted when other policies conflict, such as the lack of fit between policies encouraging infill development and Historic Properties, or how to address deterioration and degradation of Historic Properties. The issue of cultural resources protection is addressed in HP-6 through HP-8, but the language shifts significantly away from direct statements about mitigation.</p> <p>Policy HP-6: Mitigate impacts on historic, cultural, and archaeological resources caused by construction or excavation in City rights-of-way.</p> <p>Policy HP-7: Evaluate the benefits of new development relative to historic preservation in land use decisions.</p>	Linda Mayro & Loy Neff	Sustainability & Conservation	E-mail	4/19/2013
34	Changing language in policy	Historic Preservation	Chapter 3	HP-6 through HP-8	<p>While not referenced in Plan Tucson, the City of Tucson adopted Administrative Directive No. 1.07-7, "Protection of Archaeological and Historical Resources in City Projects" in 1999. Presumably, this Administrative Directive is the basis for Policy HP-6, which provides specific language guiding mitigation of impacts from construction and excavation in COT rights-of-way on historic, cultural, and archaeological resources, but there is no equivalent language about construction and excavation on private lands within COT, nor is there mention of the Archaeological Sensitivity Zones recently developed by the Historic Preservation Office. Instead, the language concerning development on private land within the City of Tucson in HP-7 and HP-8 is non-specific and much softer, lacking direct statements about protecting historic resources. The softer language changes the focus to the economic model, as in HP-7, which looks for benefits of new development to Historic Preservation instead of requiring mitigation of impacts to archaeological and historic sites. HP-8 requires new development within Historic Districts to take into account the historic context of the proposed development, but there is no direct statement requiring mitigation of impacts on cultural resources from construction or excavation within private lands. The Pima County model of applying specific mitigation measures to impacts on historic properties as requirements or conditions of rezoning and permitting is more appropriate for the stated goals of Historic Preservation.</p>	Linda Mayro & Loy Neff	Sustainability & Conservation	E-mail	4/18/2013
35	Changing language in policy	Historic Preservation	Chapter 3		<p>Even when there is explicit language requiring mitigation, as in HP-6, there is no direct statement about implementation. Implementation strategies are weak, ill-defined, or non-existent throughout the document. Vague references to implementation through existing plans, specific plans, policies, etc., inadequately define opportunities for implementing existing or new policies (e.g., Administrative Directive No. 1.07-7) and instead, ignore or constrain such opportunities. The lack of specific implementation language reflects a disconnect between the stated goals, policies, and measures of success and sustainability. Implementation is a necessary, but under-represented, component of the overall discussion, exemplified by the presentation charts' lists of goals and policies that bypass implementation and go directly to measures of success and sustainability.</p>	Linda Mayro & Loy Neff	Sustainability & Conservation	E-mail	4/18/2013

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36	Changing language in policy	Historic Preservation	Chapter 3		Rather than opening new opportunities for Historic Preservation, the overall approach within the framework of Chapter 3 constrains preservation principles and limits COT's ability to take protective actions. This is most likely due to the passage of Proposition 207, which was officially titled the "Private Property Rights Protection Act," now A.R.S. 12-1134. The Act provides that "if the existing rights to use, divide, sell or possess private real property are reduced by...any land use law enacted after the date the property is transferred to the owner and such action reduces the fair market value of the property the owner is entitled to just compensation." Consequently, the Historic Preservation discussion limits recommendations for the protection and preservation of prehistoric and historic archaeological sites by redefining cultural resources as economic assets, as in the Redevelopment and Revitalization Policies (p.3.108). The argument calls for strengthening cultural resources as assets through development without explaining how preservation goals are compatible and can be met within this framework. Alternatively, we recommend that the COT consider extending cultural resource protections as conditions of rezoning, which is a discretionary action by a jurisdiction that typically expands property owner rights and allows for intensification of land uses.	Linda Mayro & Loy Neff	Sustainability & Conservation	E-mail	4/18/2013
37	Policies/Background	Land Use & Historic Preservation	3.122, 3.126 & 3.140		OSC is also concerned about Plan Tucson's emphasis on annexation and target areas for development identified as Opportunity Areas (see, Exhibit LT-7, p.3.122). The Opportunity Areas map overlays Industrial Areas, Business Centers, and other land use categories on areas with known significant archaeological sites whose preservation would be best served by avoidance, incorporating the resources into open space, rather than development in place. Cultural resources protections language addressing annexed and other areas is absent, other than brief mention of the existing Historic Zoning Overlays, established in 1972. The section on Land Use, Transportation, and Urban Design (p.3.126) gives lip service to historic preservation in its Guidelines for Development Review (all locations and types), as reflected in Policy LT-1, regarding "sensitivity to historic and natural resources," and portions of Policy LT-26. Policy LT-26.1.15 calls for protection of historic and archaeological resources, and LT-26.1.16 (p. 3.130) and LT-26.10.4, mention preservation of COT historic architecture (P.3.140). OSC is concerned about what will happen to cultural resources (archaeological and historic sites) in annexed lands that currently are subject to County cultural resources protections and requirements for mitigation of impacts from ground-disturbing actions. There is a significant potential for substantial impacts on archaeological resources if the minimal mitigation standards established in Plan Tucson apply to unincorporated Pima County lands annexed by COT. Weakening preservation policies and cultural resources protections fails to serve cultural resources impacted by development and would negate long-term County preservation goals. OSC recommends that COT continue to meet County standards for cultural resources protections and County historic preservation policies within annexed lands.	Linda Mayro & Loy Neff	Sustainability & Conservation	E-mail	4/18/2013
38	Plan implementation & administration	Implementation	Chapter 4		Chapter 4 discusses plan implementation and administration, but fails to connect Policy with Implementation, especially concerning cultural resources protections and Historic Preservation. The Built Environment sustainability metrics and outcomes (p. 4.15) list Historic Preservation first, but the focus, again, is on historic buildings and residences. The absence of implementation discussions—nuts and bolts descriptions of how policies will be implemented—underscores the lack of connection between goals/policies and metrics/outcomes. References to existing policies, specific plans, etc., are inadequate unless supported by specific strategies for implementation.	Linda Mayro & Loy Neff	Sustainability & Conservation	E-mail	4/18/2013
39	General	Map Comments		H-2	Basically unreadable. Assign separate color for each category. Shades of same color are hard to differentiate. Include Davis-Monthan and BLM lands as Federal Lands.	Michael Grassinger		E-mail	4/26/2013
40	General	Map Comments		ED-2	Doesn't appear to include PAD's. What about Industrial and office zones (often considered commercial). Same comment regarding Federal Lands.	Michael Grassinger		E-mail	4/26/2013
41	General	Map Comments		ED-5	Unreadable at that scale. How are Correctional Facilities Economic Development Areas? Map is somewhat limited. Essentially the whole City should be considered and Economic Development Area.	Michael Grassinger		E-mail	4/26/2013
42	General	Map Comments		PR-1	Seems to show only publicly (City or schools) owned. What about County river park system, private facilities? Isn't Case Park a Natural Resources Park?	Michael Grassinger		E-mail	4/26/2013
43	General	Map Comments		AC-1	What relevance does the streetcar alignment have to this map? Is this the only place to encourage the arts in the whole City?	Michael Grassinger		E-mail	4/26/2013
44	General	Map Comments		E-1	Does the Private Schools category include private colleges such as the University of Phoenix? There are several others located in Tucson.	Michael Grassinger		E-mail	4/26/2013
45	General	Map Comments		GI-2	There are brown lines on the map such as along Houghton Road that are not reflected in the legend. What are these supposed to represent?	Michael Grassinger		E-mail	4/26/2013
46	General	Map Comments		GI-3	We talked about this map at the meeting. The legend is incorrect.	Michael Grassinger		E-mail	4/26/2013
47	General	Map Comments		EQ-1	It is missing at least one Materials Recovery Facility located at Prudence and Speedway operated by the Fairfax Companies.	Michael Grassinger		E-mail	4/26/2013
48	General	Map Comments		HP-2	There are no Federal lands shown on the map (other than DM) but it is in the legend.	Michael Grassinger		E-mail	4/26/2013
49	General	Map Comments		PI-2	The City of Tucson boundary in the legend is a different line weight than the line on the map.	Michael Grassinger		E-mail	4/26/2013
50	General	Map Comments		LT-3	The eastern half of Davis-Monthan AFB is shown as vacant but actually is heavily used as part of the "boneyard" and has other uses such as gunnery ranges, storage facilities and exercise areas.	Michael Grassinger		E-mail	4/26/2013

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51	General	Map Comments		LT-7	I appreciate the discussion we had yesterday but I still think this is an ill-conceived map that will cause numerous problems for both the public and City staff. The opportunity areas shown on the map seem to reflect only areas that are being used for those purposes today. It should be more visionary and direct development to future areas of opportunity. Ignoring the Southlands is not responsible or good planning. Part of it is already identified as the future Aerospace and Defense corridor and includes a future business park proposed by the County and TAA. There are several mistakes on this map that are hard to describe in narrative. The map should be reviewed as an overlay on aerial photos on a square mile by square mile basis.	Michael Grassinger		E-mail	4/26/2013
52	General	Problem with online form	3.20		There appears to be a problem with the online form. When I type #3.20, it is displayed as #3.2.	Tres English	Sustainable Tucson	Web	4/28/2013
53	Policy	Economic Development		ED4	Policy ED4 focuses only on the established industry clusters. These clusters are all exclusively focused on developing exports, and none of them are intended to develop industries that serve the needs of this community or region.	Tres English	Sustainable Tucson	Web	4/28/2013
54	Policy	Economic Development		ED12	Our economic development priorities should not be completely devoid of anything that would be useful here. The economic development policies should be expanded by adding ED12: "Tucson should aim to become a world leader in Desert-adapted Technologies, including water harvesting and high-efficiency food production, and should encourage the development of those technologies by supporting their use in this region." Alternately, this same idea could be integrated into the existing ED4.	Tres English	Sustainable Tucson	Web	4/28/2013
55	General	Star Community Rating System			I was pleased, although a bit surprised to learn that Tucson was not only an early participant in the STAR Communities program. I was even more surprised to see the extent to which the goals and strategies of the STAR Community Rating System had been integrated into the final draft of Plan Tucson General and Sustainability Plan. Unfortunately, as I read further into the much revised plan, I noticed that Tucson, like many other jurisdictions <http://www.asc.upenn.edu/usr/ogandy/Gandy-ESR.pdf> had marginalized a core element of sustainability planning, despite the central position that the STAR System had assigned to "Equity and Empowerment" as one of the seven categories (guiding principles). After listing Equity and Empowerment on page 24, Equity is largely ignored throughout the rest of the document. More critically, The Sustainability Indicators Matrix does not include Equity and Empowerment in any way comparable to the status it maintains in the STAR framework. This leads me to conclude that Plan Tucson has no serious commitment to this principle, will not measure it, nor will it take any actions to ensure that it is treated with the same high regard that the other indicators will receive.	Oscar H. Gandy, Jr.		Web	4/29/2013
56	General	Star Community Rating System	21		The popular definition of sustainability, the one that includes equity as a central component, is included here, but marginalized throughout the document, as if repetitions of the key phrase, "prosperity, social equity, and environmental integrity" was all that required to do well in the community and in the STAR ratings computation. Comparing the centrality of Equity in the STAR program with the Plan Tucson document should make it clear that mere mention will not be enough.	Oscar H. Gandy, Jr.		Web	4/29/2013
57	General	Star Community Rating System	182		The so-called "Sustainability Indicators Matrix," which barely makes an effort to identify specific indicators, makes reference to equity and equitable access from time to time, but it does not include Equity and Empowerment as one of the components in the same way that it is included in the original STAR guidelines. Surely we are not assuming that the STAR organization was not really serious about including among the seven core principles. Not one of the "metrics" referenced in the three categories emphasized in the Plan Tucson Matrix includes an indicator, or measure of equity (or empowerment).	Oscar H. Gandy, Jr.		Web	4/29/2013
58	General	Neighborhoods	2.13 ff		The final draft of Plan Tucson is as beautifully written and illustrated as a planning document can be. It does an excellent job of connecting the dots between neighborhood stability, historic preservation, sustainability, and economic issues. Thank you for your hard work! That being said, I have identified some areas of concern and possible solutions (in bold font for readers pressed for time). 1) The section on Neighborhoods (page 2.13 ff) misses a key point. Renters will generally not pay to water landscaping. Promoting home ownership is essential to meeting the city's sustainability goals with respect to native vegetation and street trees. A citywide illustration of this point is the die-off of Aleppo pines. These trees have not been stricken by disease, nor have they reached the end of their life cycle. The problem is lack of care by the current occupants (mostly renters) of the properties where the trees are growing. The city could promote home ownership in a number of ways. Better publicity for the historic property tax break, available only to owner-occupants, comes to mind. Collaboration with the University on an employer-assisted housing program, or setting up a separate program for city employees, also comes to mind. Lastly, it would be refreshing if someone from city government would speak out when committed citizens, those who participate in the civic process of our city, those who care about their neighbors, are publicly vilified as NIMBYs and CAVE (Citizens Against Virtually Everything) people.	Diana Lett	Chair, Neighborhood Preservation Committee Feldman's Neighborhood Association	Web	4/30/2013

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59	General	Historic Preservation	3.87 ff		<p>2) The section on Historic Preservation (page 3.87 ff) is still too weak. It tiptoes around our city's racist history of destroying most of the original downtown and displacing its primarily Latino residents. It fails to acknowledge the 14-story student housing towers under construction in West University Historic Neighborhood, over the strenuous objections of the neighborhood. It makes no mention of the long history connecting these two events, a history of giveaways to developers who did not serve the interests of our community.</p> <p>This history should inform us that conflict is inevitable between neighborhood stability and historic preservation, on the one hand, and more intensive land uses, on the other hand. It is not enough to allow neighborhood representatives, with no legal training or land use planning education, to go up against developers in zoning hearings. The scales in such a confrontation are weighted in favor of the party who can pay the best attorney. The city must rebalance the scales in favor of the ordinary citizen, perhaps through the services of an ombudsman or legal advocate. Failing to manage these conflicts in a way that prioritizes neighborhood stability and historic preservation guarantees that we will continue to lose our irreplaceable historic neighborhoods and buildings.</p>	Diana Lett	Chair, Neighborhood Preservation Committee Feldman's Neighborhood Association	Web	4/30/2013
60	Policy & Map	Land Use	3.122	LT-7	<p>3) Exhibit LT-7 Plan Tucson Opportunity Areas (page 3.122) identifies most of Feldman's Neighborhood as an Existing Neighborhood. The part of our neighborhood between Stone and Seventh Avenues is designated a Mixed-Use Center, consistent with its inclusion in the Greater Infill Incentive District. The IID is a problematic ordinance, up for sunset review this fall. One of the projects permitted under the Greater IID is The District, in West University Historic Neighborhood. This development is absurdly incompatible with the surrounding neighborhood. Its construction damaged the surrounding historic adobe structures, to say nothing of historic buildings demolished outright. It continues to generate significant quality-of-life issues that are driving owner-occupants out of the area. And the Kicker . . . The District is not fully leased.</p> <p>As a city, we need to take a step back from the planning policies that created The District and The Stone Avenue Standard. Before we incentivize more of the same, we need to see how the new private dorms succeed or fail and how they impact the surrounding community. We do not need to enshrine the mistakes of the Greater IID in Plan Tucson. The Stone Avenue Corridor in Feldman's Historic Neighborhood should be developed in a manner that promotes preservation of existing historic Craftsman and Mission Revival structures. This area should be removed from the Mixed-Use Center (reddish purple) designation and shifted to a less-intense designation, such as Mixed-Use Corridor (magenta).</p>	Diana Lett	Chair, Neighborhood Preservation Committee Feldman's Neighborhood Association	Web	4/30/2013
61	Grammar & Typos	Typos	1.3		<p>Not worthy of raising to that level, of course, but passing them on in case you haven't caught them yet, which you probably have:</p> <p>P 1.3 , last paragraph under mandated Elements: "Economic" is missing from "Social and Economic Environment"</p>	Arlan M. Colton	Pima County Development Services Department	E-mail	5/1/2013
62	Grammar & Typos	Typos	2.1		P 2.1, last paragraph "Presidio" is missing it's second "I" (I eyed this one...groan)	Arlan M. Colton	Pima County Development Services Department	E-mail	5/1/2013
63	Grammar & Typos	Typos	2.13-2.14		P 2.13-2.14, last line of 2.13 and continuing: It mentions HOA's and subdivisions. I doubt there would be an HOA (as opposed to a neighborhood association) not created in conjunction with a subdivision or master planned community. Maybe a better way to say this is "...in the form of subdivisions, either with or without a homeowners association..."	Arlan M. Colton	Pima County Development Services Department	E-mail	5/1/2013
64	Grammar & Typos	Typos	3.14	LT26.9.1	<p>P 3.139, LT26.9.1 Strike the "d" from "Evaluated"</p> <p>Those are the ones that jumped out at me...may be others.</p> <p>Is there ever the possibility that the identical policy could be listed twice in two different sections? I thought I saw one, anyway. Would have to re-find....</p> <p>In checking my notes, I may have missed a point or two in the letter we wrote. If I rediscover them, I'll let you know. Not changes however, just points I was planning on making.</p>	Arlan M. Colton	Pima County Development Services Department	E-mail	5/1/2013

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65	General	DMAFB & Land Use & Noise			<p>On April 5, 2013, the Chair of Military Community Relations Committee (MCRC) sent a letter to you regarding the draft General Plan ("Plan Tucson"). The authority to have sent this letter is in dispute, so the Julia Keen Neighborhood Association (JKNA), an MCRC member, is hereby setting forth its own views on the matter. The Julia Keen Neighborhood is located at the northwest end of the Davis-Monthan Air Force Base (DM) runway. There is no other Air Force base in the continental United States with approach and departure corridors located over a densely populated urban area and our neighborhood is the most affect area. We are the victims of poor Air Force planning that was so aptly set forth in the 1968 University of Arizona study by M.R. .. Bottaccini: At this time [1953] the Air Force made what is technically a bad decision. To accommodate jet aircraft [for the first time] it was decided to build a new major runway near the existing facility. With 8.25 miles of land available the engineers decided to build near the northern boundary and, hence, as near Tucson as possible. The author believes that little or no consideration was given to the noise problem ... [y]et had there been a little foresight and had the base been moved to the southern end of government-owned land the noise situation would be much more comfortable today.¹</p> <p>The study provides further background:</p> <p>... DM was an ideal airport for propeller... driven airplanes. B17's, B24's and even B29's could turn away from the City by circling to the north or south in uninhabited land. Garrison and support community lived agreeably together in near symbiosis²</p> <p>----- ¹A Preliminary Discussion of the Problem of Aircraft Noise at the University of Arizona, M.R. Bottaccini, Registered Professional Engineer, March 10, 1968, at Page 21, commissioned by the American Association of University Professors.</p>	Rita Ornelas & Mark Mayer	Julia Keen NA	Hard Copy	5/2/2013
66	General	DMAFB & Land Use			<p>The Julia Keen neighborhood was approximately two-thirds built out in 1953 when the new jet aircraft runway was built, so the term "encroachment" should relate to how DM's ever-increasing activities and expansions affect our existing neighborhood, not the other way around. As to the disputed MCRC letter, we take issue with the following:</p> <p>1. Under the third bullet beginning at the bottom of Page 1, a reference is made to "[p]otential redevelopment opportunities which might benefit neighborhoods and DMAFB." JKNA knows of no such possible benefits and the reference should not be incorporated into the draft plan. The ever-increasing additions of high-powered jet aircraft (e.g., F-18, Harrier, F-22 and F-35) affects not only our neighborhood, but neighborhoods further to the northwest along the flight path and elsewhere. Any meaningful "redevelopment" could only constitute the wholesale conversion of this greater area to industrial and other "compatible" uses that would literally cost billions of dollars and the result would be a Tucson that current residents would hardly recognize.</p> <p>2. Under the fifth bullet that follows on Page 2, the letter indicates that planning and analysis consideration be given to the residential areas within accident potential zones and the 70-74 1dn noise contours. In Julia Keen, DM aircraft operations negatively affect the area outside this perimeter, and the same holds true for other neighborhoods to the northwest and beyond. This attempt to divide affected residential areas needs to be rejected and a more holistic planning approach adopted. Such approach would include the areas within both the current and potentially future 65-70 1dn noise contours, as well as areas affected by particular flight patterns, aircraft run-ups, and other environmental issues.</p>	Rita Ornelas & Mark Mayer	Julia Keen NA	Hard Copy	5/2/2013
67	Policies & General	DMAFB & Public Health			<p>3. Under the seventh bullet that follows on Page 2, reference is made to Public Health Policies and separation of residential and industrial land uses. The text goes on, however, to not raise public health concerns directly related to DM aircraft operations (e.g., hearing loss and high blood pressure outcomes, to name a few), but rather to frame the issue as "quality of life activities" for "residents and guests." The plan needs to have a clear policy that documents and addresses the health issues related to aircraft operations in and over Tucson and that promotes cooperation with the Pima County Health Department, the University of Arizona, and appropriate state and federal entities in this regard.</p> <p>-----³Such schemes have included noise insulation of homes (never supported by JKNA), using local tax dollars to shift the DM runway a limited distance to the southeast, and extending industrial development further into the Julia Keen neighborhood.</p>	Rita Ornelas & Mark Mayer	Julia Keen NA	Hard Copy	5/2/2013
68	Policies & General	Land Use & DMAFB			<p>In general, JKNA if very disaffected by the numerous proposals put forth in the guise of "helping" the affected neighborhoods, but for which the real intent is to convince the Air Force that the "encroachment" problem is finally "solved" and any and all manner of high-powered jet aircraft operations may now be brought into DM with confidence³. The end result is ruinous for the Julia Keen neighborhood and the draft general Plan should not include any such schemes. Rather, a sober, holistic planning analysis is needed for the affected areas that takes into account the full range of scenarios as to the disposition of DM operations.</p>	Rita Ornelas & Mark Mayer	Julia Keen NA	Hard Copy	5/2/2013

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69	Polices	Public Safety "Other Related" Tables	3.25 - 3.57		There are 2 (two) PS 9 policies (which then makes all other policies with related policies PS 10 incorrect - as there is no PS 10?). Related Policies: Please add GI 4 (aligns with PS3, PS4, PS6, PS9, PS10) Related Policies: Please add GI 4, GI 6 (aligns with E1, E2, E6, E7) Related Policies: Please add GI 6 Related Policies: Please add GI 2, GI 6 Related policies: Please add GI 4 (aligns with AC1, AC3, AC6, AC9) Related Policies: Please add GI 6 (aligns with PH1, PH5, PH8) Related Policies: Please add GI 1, GI 4, GI 6 (aligns w/ G6, G7) Related Policies: Please add GI 6 (aligns w/ AG 3, AG4)	Irene Ogata	City of Tucson	Web	5/2/2013
70	Typos	Land Use	3.129		In bold at bottom - starting pg. number needs to change to 3.130	Irene Ogata	City of Tucson	Web	5/2/2013
71	General	General			Thank you for the opportunity for the 355th Fighter Wing to comment on the City's "Plan Tucson" effort. We believe strongly in the positive and synergetic relations between the community and DM and how Tucson plans for that future is as critically important to our collective success as how well we work together to achieve that plan. I have asked my Community Liaison and Civil Engineer to review the draft plan and offer any comments that may be helpful in communicating appropriate references to Davis-Monthan and the Department of Defense. The attached comment matrix outlines comments that are general in nature, specific to pertinent sections of the plan and a few administrative/format type comments. If you have any questions please feel free to contact Mr. Scott Hines, my Community Liaison, 228-5060 or Mr. James Barker, my deputy Base Civil Engineer, 228-3401. Again, I thank you for this opportunity to provide input to Tucson's deliberate planning for the future of this Community over the next 5-25 years. The Airmen and families serving at Davis Monthan are part of this community and we are very interested in how this community grows and supports our homes, health, education and play.	Colonel Kevin Blanchard, Commander	DMAFB	E-mail	5/2/2013
72	General	Arizona Revised Statutes			Consideration should be given for inclusion of language clarifying the requirements under the Arizona Revised Statutes for deliberate consideration of planning and development "if the general plan or an element or amendment of the general plans is applicable to the territory in the vicinity of a military airport of ancillary military activity as defined in Section 28-8461, the military airport." Including current ASLD Map. (Map was provided but is not insert able.) The plan appears to go beyond the ARS requirements. It may be beneficial to include language to make the apparent to the reader.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
73	General	Governance & Participation	3.55		Chapter 3: Governance & Participation: More specific comments concerning the relationship and coordination between the City and Federal Agencies might be beneficial here. Example: Page 3.55, left Column. Draft sample wording to edit from. "The City works with federal agencies such as the Department of Defense, Department of Homeland Security, and Department of Justice etc. on planning efforts that interface within the City's jurisdiction. Maintaining proactive relations for short and long-term planning ensure collaborative and synergetic development meeting federal agency needs and the City's overall vision for future growth of the City of Tucson."	Scott Hines, Director	DMAFB	E-mail	5/2/2013
74	Polices	Governance	3.56		Polices: Update to include "Federal Agencies" where appropriate within various G1-G12 guidelines.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
75	Wording		3.81 & 3.82		Noise, JLUS wording. No comment or suggested changes.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
76	Map	Land Use	3.115	Exhibit LT-3	Area of map which currently includes DMAFB, specifically the 309th AMARG (Bone Yard), Small Arms and EOD Ranges are shown as Open Space/Common Area. This might create some confusion for planning purposes. Recommend some visual clarification (boundary line or hashing) to clarify areas current used by DMAFB. Additionally it may be helpful to include the depiction of the Accident Potential Zones within Approach Departure Corridor.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
77	General	Land Use	3.125-3.141 specifically 3.128	LT23	Pages 3.125-3.141, specifically page 3.128, LT23 provides general oversight, guidance for consideration of Military Mission Complex considerations in development and planning. No comment, suggestions.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
78	General	Land Use	3.116		There seems to be something missing between this and next page. Guidelines Manual: The manual was prepared in 1999 and has been used officially by the City of ???	Scott Hines, Director	DMAFB	E-mail	5/2/2013
79	Typos	Typos	3.136		Mid page right side, appears to have duplication of bottom Note "Set 6 continued on next page."	Scott Hines, Director	DMAFB	E-mail	5/2/2013
80	Map	Land Use	3.115	LT-3	Small Arms Range and EOD Range are shown as Open Space/Common Area on map. Recommend range use be delineated on map to assist in planning purposes. 355 CES can provide map reflecting these ranges if required.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
81	Map	Land Use & Maps	3.117	LT-5	Airport Environs Overlay Zone does not reflect the Accident Potential Zone (APZ) within Approach Departure Corridor. 355 CES can provide appropriate map if required. Airport Environs Overlay Zone. Consider adding Military Airport Vicinity Box in accordance with ARS for deliberate consideration of planning and development in this area.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
82	Map	Land Use	3.116 & 3.82		City of Tucson Overlay Zones reflects AEZ -- dated April 16, 1990. Page 3.82 indicates Tucson Mayor and Council adopted the AEZ subsequent to the JLUS in 2004. Please confirm date or reconcile wording.	Scott Hines, Director	DMAFB	E-mail	5/2/2013

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83	Map	Land Use	3.122	LT-7	Tucson Opportunity Areas – the land immediately east of DMAFB is included in the Houghton Corridor Area. We do not consider residential development of this area to be compatible use with the mission of DM due to the close proximity to the firing range and Explosive Ordinance Disposal Range. Noise complaints are already received from the Rita Ranch area for activities on these ranges. In addition, these are FUDS lands which are projected for survey by the Army Corps of Engineers in the future when funding becomes available. These concerns were identified by DM during the planning stage.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
84	Background	Planning Context	2.11	T-6	Plans, Studies, & Other Initiatives Approved by Mayor & Council. Consider including Joint Land Use Study adopted by Mayor & Council in 2004 to the table.	Scott Hines, Director	DMAFB	E-mail	5/2/2013
85	Policies	Land Use			The existing land use map below states that vacant State Lands are open space/common area... Vacant or undeveloped may be a better term...	Tom Bolton	Arizona State Land Department	E-mail	5/2/2013
86	Policies	Land Use	3	LT26.1.17	Edit "Support" to "Promote."	Irene Ogata	City of Tucson	Web	5/2/2013
87	Policies	Land Use	3	LT25.1.18	Edit "Support" to "Require."	Irene Ogata	City of Tucson	Web	5/2/2013
88	Policies	Land Use	3	LT25.1.20	Edit "Support" to "Assure."	Irene Ogata	City of Tucson	Web	5/2/2013
89	Policies	Land Use	3	LT25.1.21	Edit "Support" to "Require."	Irene Ogata	City of Tucson	Web	5/2/2013
90	Policies	Land Use	3	LT25.1.22	Edit "Support" to "Promote."	Irene Ogata	City of Tucson	Web	5/2/2013
91	Policies	Land Use	3	Add LT25.1.23	Protect trees contributing to mitigation of urban heat island by requiring ample soil capacity in root zone.	Irene Ogata	City of Tucson	Web	5/2/2013
92	Policies	Land Use	3	LT26.4.2	Add ".....sidewalks, street trees and"	Irene Ogata	City of Tucson	Web	5/2/2013
93	Policies	Land Use	3	LT26.4.16	Add "compatible development and landscapes...."	Irene Ogata	City of Tucson	Web	5/2/2013
94	Policies	Land Use	3.135	LT25.5.1:b	Add "....connections, that include shade, in...."	Irene Ogata	City of Tucson	Web	5/2/2013
95	Policies	Land Use	3.135	LT25.5.1:e	Add "....illuminated, shaded, and...."	Irene Ogata	City of Tucson	Web	5/2/2013
96	Policies	Land Use	3.136	LT25.5.6	Add "centers, nodes and contributes to the reduction of urban heat islands."	Irene Ogata	City of Tucson	Web	5/2/2013
97	Policies	Land Use	3.136	LT26.6.1:b	Add "....connections that include shade in...."	Irene Ogata	City of Tucson	Web	5/2/2013
98	Policies	Land Use	3.136	LT26.6.1:e	Add "....illuminated, shaded, and"	Irene Ogata	City of Tucson	Web	5/2/2013
99	Policies	Land Use	3.137	LT26.6.6	Add "....centers, nodes and contributes to reduction of urban heat islands."	Irene Ogata	City of Tucson	Web	5/2/2013
100	Policies	Land Use	3.138	LT26.7.5	Add "....oriented with appropriate shade; the...."	Irene Ogata	City of Tucson	Web	5/2/2013
101	Policies	Land Use	3.138	LT26.7.9:e	Add "....landscaping reduction of urban heat island effects and...."	Irene Ogata	City of Tucson	Web	5/2/2013
102	Policies	Land Use	3.139	LT26.7.10:e	Add "....landscaping reduction of urban heat island effects and...."	Irene Ogata	City of Tucson	Web	5/2/2013
103	Policies	Land Use	3.139	LT26.8.7	Add "....nodes and contribute to reduction of urban heat islands."	Irene Ogata	City of Tucson	Web	5/2/2013
104	Policies	Land Use	3.140	LT26.9.1:c	Add "....access with appropriate shading, and...."	Irene Ogata	City of Tucson	Web	5/2/2013
105	Policies	Land Use	3.140	LT26.10.2:c	Add "....nodes, to include appropriate shading for pedestrians and bicyclists, to...."	Irene Ogata	City of Tucson	Web	5/2/2013
106	Policies	Land Use	3.140	LT26.10.2:e	Add "....design; the gathering spaces shading for pedestrians and bicyclists, to...."	Irene Ogata	City of Tucson	Web	5/2/2013
107	Policies	Land Use	3.140	LT26.10.5	Change "Support" to "Promote."	Irene Ogata	City of Tucson	Web	5/2/2013
108	Policies	Land Use	3.140	LT26.10.6	Change "Support" to "Require."	Irene Ogata	City of Tucson	Web	5/2/2013
109	Policies	Land Use	3.140	LT26.10.8	Change "Support" to "Assure."	Irene Ogata	City of Tucson	Web	5/2/2013
110	Policies	Land Use	3.140	LT26.10.9	Change "Support" to "Require."	Irene Ogata	City of Tucson	Web	5/2/2013
111	Policies	Land Use	3.140	LT26.10.10	Change "support" to "Promote."	Irene Ogata	City of Tucson	Web	5/2/2013
112	Policies	Land Use	3.140	Add LT26.10.11	Protect trees contributing to mitigation of urban heat island by requiring ample soil and capacity in root zone.	Irene Ogata	City of Tucson	Web	5/2/2013
113	Typos	Appendix		Appendix A	Looks like the first 4 Plan Elements are incorrect? They should be Housing, Economic Development, Public Safety and Parks & Recreation.	Irene Ogata	City of Tucson	Web	5/2/2013
114	General	General			<p>Thank you for the opportunity to comment on the Final Draft of the City of Tucson General and Sustainability Plan, 2013. As you are aware, we submitted comments for the original Draft from a number of County Departments to you on January 16, 2013. Overall, we find the second Planning Commission review draft an improvement over the first draft, and we are pleased that many of the comments were considered in preparation of the Final Draft.</p> <p>With the incorporated area boundaries of the City of Tucson coinciding with the unincorporated area under the jurisdiction of Pima County, the General Plan is a key representation of potential cooperation and collaboration between the two local governments. A number of our comments draw particular attention to the plans and policies pertaining to economic development around the Aerospace and Defense Corridor area south of Raytheon and the Tucson International Airport. Close collaboration between our two governmental entities and other public and private interests is necessary to optimize our opportunities for encouraging increased employment in this key activity node within of our community.</p> <p>To support the development of the appropriate desirable land uses throughout the region, necessary infrastructure must be planned and implemented. All governmental jurisdictions need additional sources of revenue to facilitate the development of such infrastructure. The City of Tucson and Pima County should devise policies and methods for increasing infrastructure investment through identification and establishment of revenue-generating initiatives that are mutually beneficial in advancing such infrastructure development.</p> <p>The following are specific comments on the Final Draft from many of the Departments who previously responded and from additional Departments. We hope you find these comments to be helpful in further shaping the update.</p>	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
115	Map	Economic Development and Map ED2	3.14		1. Does not reflect recently annexed County property which is most of Section 31 south of Raytheon. Reference is SEC 31-15-14.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013

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116	Map	Economic Development and Map ED5	3-19		2. Does not reflect planned Aerospace & Defense Corridor with a road from Rita Road and 1-10 across the Old Vail Connection to Alvernon, then curved through the planned business park south of Raytheon to Hughes Access Road at Nogales Highway.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
117	Policies	Economic Development	3-20		3. Doesn't identify any collaboration with Pima County and/or the Tucson Airport Authority on the development of the Aerospace & Defense Corridor and Business Park as an Economic Development Policy initiative.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
118	Map	Land Use and Map LT3	3-115		4. Show SEC 31-15-14 - as Vacant - where the short term plan is for it to be industrial just like SEC 32-15-14 next to the east. Currently, both sections are vacant and should be treated similarly.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
119	Map	Land Use LT6	3-119		5. Bicycle Routes - existing or planned. - No reference to the Aerospace Corridor across Old Vail Connection which includes a bike path in the cross section of the plan. 7.5 miles of this 9.5 mile route are in the City of Tucson.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
120	Map & Background	Land Use LT7	3-121 & 3-122		6. Opportunity Areas for Future Development - No reference to the Aerospace Corridor from 1-10 to Nogales Highway for light industry and logistics development per the Joint Planning Advisory Council (JPAC which includes PAG, CAAG, MAG) recommendations for highest chance of success in the entire state for an Import Distribution Center. Mayor Rothschild has been active on these panel discussions.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
121	Map	Land Use LT7	3-122		7. Industrial Area identification south of Tucson International Airport is in vacant land. Move 1/2 section south. This is the very area identified in the JPAC study as ideal for logistics and Import Distribution which meets the definition on Page 3-123. Pima County submitted a suggestion that the entire corridor across Old Vail Connection to 1-10 be master planned as Industrial to avoid residential and non-compatible uses.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
122	Policies	Land Use	3.128	LT-23	8. The Tucson Airport Authority has approved their new Master Plan for submittal to the FAA. That plan includes a new full-service, parallel runway which will create a heavier used traffic pattern to the south and west of the airport. This should be reflected in LT-23 wording regarding Airport Environs.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
123	General	Review Guidelines	3-139	Set 9	9. This would be the ideal area to identify the benefits of a master planned light industry corridor with no conflicting land uses or encroachment on existing residential uses.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
124	Background Wording	Star Community Rating System	4-15		10. Preplanned Industrial Development and Residential planning can be accomplished as a part of Land Use master planning process. Need to cite the value of master plans like Plan Tucson to insure the Built Environment expands in compatible synergy with new growth.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
125	General	Built Environment			There are no known references in this Plan to collaboration with surrounding Cities, Towns, and the County for the expansion of the Built Environment to a Region wide comprehensive model that incorporates many of the benefits identified in this plan. We are aware that this is the City of Tucson's plan but it does not exist in isolation from the surrounding communities.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
126	General	Built Environment & Housing		LT-1	One of the major hallmarks of the Imagine Greater Tucson vision is to create meaningful choices in terms of housing stock, transportation modes etc., and to recognize that the urban design of the region needs to both be more dynamic and efficient both to appeal to changing demographics and to make wiser use of scarce resources. This is implied in the policies to some extent, notably L T-1, but it is not clearly stated as a matter of policy. Transportation choices are more fully addressed in the policies than housing choices and bold urban design either in this section or the housing section earlier in the document. There ought to be enough in the policy language to allow for implementation strategies that get at the diverse housing needs of all age cohorts in the city, notably the younger generations who are dramatically different than baby boomers and the aged from a social service delivery standpoint. Neither population will be driving as much, so location and style of housing are critical. Staff suggests boosting the appropriate policies to ensure both the urban vibrancy the youth need in order to stay and invest in the City and that some of the active adult population desire as well.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
127	Policies	Land Use		New Policy LT-5	Is welcome along with the revisions to L T-4 but these could be combined into a much needed stronger policy with more specific direction to foster and eliminate barriers to the list in L T-4 (and LT-1 for that matter). An option could be to add to the list in L T-4b "modifying the Major Streets and Routes Plan to eliminate barriers."	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
128	Policies	Land Use		LT-20 & LT-21	Probably ought to be prefaced with "Continue to" as it is our understanding that the City has been expecting to do so whenever an annexation impacts the Conservation Lands System. L T-21 should be implicit within L T-20 since that is what L T-20 means in terms of implementation, unless L T-21 is intended to apply to any rezoning in the City which is unlikely. L T -20 means nothing without implementing L T -21, so we would suggest that L T-21 begin with something other than "consider", if the two policies are kept separate.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
129	Policies	Land Use		LT-18	Inadvertently puts a negative spin on development in the Houghton area (assumed to be generally north of 1-10), and in turn could push development into the unincorporated area. The development of this state land needs to be a focus and the policy should include language to the effect that new development here is prioritized with the understanding that the nature of the development is urban and must of course be well served by infrastructure.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013

#	Type of Comment	Topic	Final Draft Page or Chapter #	Final Draft Goal or Policy #	Comment	Commenter's Name	Commenter's Affiliation	Method received	Date received
130	General	Glossary		LT-19	There is reference to Municipal Planning Area, but staff did not see a definition or description of this in the text, although we may have just missed it. Staff suggests that it be added to the glossary, and a map with discussion in the text.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
131	General	Implementation Development Guidelines	3.129		As noted below, while we are not commenting on each and every statement, the development review guidelines beginning on page 3.129 are a welcome addition to the document and provide significantly further guidance necessary in an almost pure policy plan. Somewhere in the implementation section, there ought to be some additional guidance to staff and decision makers for what happens if and when policies and these guidelines conflict when a new land use is being considered on a property.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
132	Policies	Water	3.67-71	WR-1, WR-7 & WR-10	<p>Tucson Water is the region's dominant water provider. The text (p. 3.67-71) repeatedly refers to the regional nature of water, cites the City/County study, and describes the issue of limited expansion of water service outside the city (in many areas contingent on annexation into the City) but could go further toward its resolution. Policy WR 10 states: "Continue to manage the City's Water Service Area, considering service area expansion only when it furthers the long-term social, economic, and environmental interest of City residents." Some additional emphasis that Tucson Water serves significant areas outside the city limits might be offered, as is suggested by WR-7 which promotes a more regional perspective: "Collaborate on multi-jurisdictional and regional water planning and conservation efforts." Regional coordination of water supply with the ability to extend service to infill development in unincorporated areas is one important factor in creating a more efficient, sustainable future land use pattern. To that end, it makes sense to modify this policy to identify at least the main collaborators, and we suggest adding "with other major regional water providers and the Pima County Regional Wastewater Reclamation Department" after "Collaborate". Consistent with the Water/Wastewater Study recommendations, the region's land use planning agencies could also be included here.</p> <p>There is potential for conflict between Policies WR-1 and WR-10, perhaps others within the context of the application to the Water Service Area. For example, while it makes sense to continue infilling water delivery in the northeastern Tanque Verde Valley, it also makes sense to recognize either in Policy WR-1 0 or elsewhere that the interests of City residents in many cases is tied inextricably with the region, especially in terms of water for economic development, but also in terms of the overall social and environmental health of the region.</p>	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
133	Map	Land Use		LT-7	The land use model-based Opportunity Areas Map (Exhibit L T-7) is intended to layover more detailed neighborhood plans and provide a 'high-elevation' view of future urban form for the City. The opportunities map is much improved over the first draft, leaving no ambiguous, indeterminate white areas missing land use guidance. For example, areas of stability not expected to see significant change within the plan horizon such as existing neighborhoods now also include development-related descriptions and assumptions.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
134	Map	Land Use	3.125		The Opportunity Areas Map overlays more detailed plan types which will stay in place and will continue to provide guidance for future land use decisions. The discussion on page 3.125 suggests that detailed 'specific planning' needs to be pursued to implement the Plan, and the topic of how the new map relates to existing area and neighborhood plans may be under-emphasized in the Land Use section (more detailed discussion exists in the Plan Implementation and Administration section); it is these more detailed plans that are currently considered for amendment when a change in land use is proposed. The discussion mentions gaps in coverage of the extent of neighborhood plans but does not give much detail on the current situation; a map exhibit might help. The significant next steps proposed in the plan will be to update the local plans and create gapless specific plans that respect the history and detail of the existing local plans but also exploit the power of modern mapping/information technology.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
135	General	Implementation	4.8		Staff strongly supports the proposal to create meaningful, measurable community indicators tied to an annual monitoring plan (and work plan) (p. 4.8).	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
136	General	Implementation	4.9		<p>The description of the plan amendment process (p. 4.9) is helpful though possibly still somewhat ambiguous. The thresholds for a major amendment include lack of an existing adopted specific (area, neighborhood) plan, size of property (65 acres or greater) and inconsistency with the Opportunity Areas Map Building Block designation. The criterion of the inconsistent Building Block designation which "must be changed" could imply that it is in fact a planned land use map, where earlier it has been described as more generalized image providing guidance for future planning but not having property specific geography. This, of course, will be addressed when the existing specific plans are reformulated to implement the Opportunity Areas Map and spatial gaps are filled in.</p> <p>Potential Annexation Areas are mentioned in the legend, but we Couldn't find any on the map.</p>	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
137	General	Glossary	3.72		We appreciate the reference is made to Low-Impact development (LID), which was one of our previous comments ... Staff suggests this term be included in the glossary and that words in the text and perhaps in the definition differentiate the concept from low density development as they are not at all the same thing, but could be confusing to the public.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
138	General	Water	3.96		Reference to the Water/Wastewater Study should note that the Action Plan is being implemented and that a new Action Plan will begin for the next five years, informed by the study, Plan Tucson and the County's upcoming Comprehensive Plan Update.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013

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#	Type of Comment	Topic	Final Draft Page or Chapter #	Final Draft Goal or Policy #	Comment	Commenter's Name	Commenter's Affiliation	Method received	Date received
139	Policy	Economic Development and Land Use		New ED-12	Building upon the comments of the Strategic Planning Office above, an Economic Development and/or Land Use policy would be welcome that would more explicitly, perhaps as a new ED-12, address collaborating with the County, the Airport Authority, the University, the private sector and others toward eliminating barriers for economic development land use, transportation and supporting use proposals in the employment corridor, notably the Aerospace and Defense Corridor.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
140	General	Implementation	Chapter 4		Lastly, staff applauds the new section in Chapter 4 which addresses the critical linkage between the General Plan and the Annual and Capital budgets of the City, which is something the County will also be looking at in its Comprehensive Plan Update. If the spending and capital programs are not implementing the plan, the plan will be undermined and cease to be a truly useful tool for the city.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
141	General				DOT has reviewed revised draft Tucson General Plan Update. We are comfortable with the revisions that were made and have no further comments.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
142	Background	Public Safety			1. Upon review of the first draft it was suggested that Flood Control could be added to the list of agencies providing public safety services. We recognize that the City is organized differently and that "Flood Control" may not be the correct department in the City's case. Staff did not mean to request that Pima County Regional Flood Control District should be added as a public safety entity, but that the City's own responsible party be identified as appropriate. The National Flood Insurance Program recently audited the City and County for our performance under the Community Rating System (CRS). Neither our public safety elements were scored highly. Efforts to strengthen the flood response and management plans could improve the City's rating under CRS and thereby the flood insurance rates paid by residents. These are set to increase including phasing out grandfathered rates. Incorporation of this terminology is appropriate given flood control is a public safety service already being provided and referencing it in plans could benefit the City under CRS.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
143	General	Water			2. Thank you for acknowledging the cooperative efforts on the Lee Moore Wash Basin Management Study. Again this may help with regard to the City's CRS rating in terms of inter-jurisdictional watershed based flood control planning efforts.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
144	General	Land Use			3. Thank you for amending the Land and Transportation Goal of retrofitting streets using green infrastructure and water harvesting techniques to include other ROWs for clarity and continuity.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
145	General	Green Infrastructure			4. As previously noted the inclusion of elements addressing Green Infrastructure is laudable, and they have been strengthened by inclusion of Low Impact Development (LID) terminology.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
146	General	Water			We believe the changes made and the plan as a whole highlight inter-jurisdictional coordination of watershed based stormwater and flood control planning. The Lee Moore Wash Basin Management Study, Design Standards for Stormwater Detention, and LID manual are prime examples of this cooperation. Inclusion of these issues helps improve both the County and City rating under the National Flood Insurance Program's Community Rating System as well as providing direct public safety, water conservation and service delivery benefits to the community.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
147	General		1.1-1.2		At the request of City of Tucson (COT), staff from the Office of Sustainability and Conservation (as C) conducted inter-jurisdictional review for cultural resources of the revised COT document, Final Draft Plan Tucson: City of Tucson General & Sustainability Plan 2013 (Plan Tucson). The revised draft Plan Tucson is currently open to public review prior to final review and adoption. The revised document incorporates previously submitted public comments and comments from other governmental agencies and nongovernmental organizations. Plan Tucson replaces the General Plan adopted in 2001 in response to the requirements of State law that jurisdictions revisit their existing general plans every ten years and either readopt that plan or adopt a new plan. COT has prepared a new plan, focused on long-term policy to guide decisions affecting "elements that shape the city, such as housing, jobs, land use, transportation, water, and energy resources" (pp. 1.1 -1.2). Plan Tucson is intended to be used in conjunction with other long-range plans, policies, specific plans and regulations that affect development. The following comments reflect OSC observations and concerns about how Plan Tucson addresses Historic Preservation issues and Cultural Resources protections (archaeological and historic sites).	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013

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148	General & Policies	Historic Preservation	Chapter 3	HP6-HP8	<p>OSC appreciates that Plan Tucson provides discussion of Historic Preservation issues based on input from the COT Historic Preservation Office. Chapter 3, The Built Environment, discusses the increase in numbers of historic homes in Tucson (50 years old or older), especially over the last decade, and establishes a context for historic preservation that equates historic "status" to enhanced property values, an assertion supported by several cited studies in COT and other jurisdictions across the U.S. The discussion provides background to the development of Historic Preservation goals that are expressed in policies HP-1 through HP-8 (p.3.93). The Historic Preservation discussion in Chapter 3 is intended to guide preservation initiatives and provide incentives directed at historic homes, commercial buildings, and historic districts and preservation zones, to enhance property values. Plan Tucson outlines technical and financial assistance to owners of Historic Properties and Historic neighborhoods. This approach redefines historic properties as economic assets, assigning secondary importance to historical significance and integrity in a development model that uses historic preservation to promote economic benefit. OSC recognizes the economic value of Historic Properties and agrees that resulting improvements to historic properties would be beneficial, but we note with concern the reprioritization of core Historic Preservation values and the lack of consideration of how to protect non-renewable archaeological sites. Challenges to Historic Preservation policies are noted when other policies conflict, such as the lack of fit between policies encouraging infill development and Historic Properties, or how to address deterioration and degradation of Historic Properties. The issue of cultural resources protection is addressed in HP-6 through HP-8, but the language shifts significantly away from direct statements about mitigation.</p> <p>Policy HP-6: Mitigate impacts on historic, cultural, and archaeological resources caused by construction or excavation in City rights-of-way.</p> <p>Policy HP-7: Evaluate the benefits of new development relative to historic preservation in land use decisions.</p> <p>Policy HP-8: Integrate historic, archaeological, and cultural resources in project planning, and design when development occurs in historic districts.</p>	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
149	General Policies	Historic Preservation		HP6-HP8	<p>While not referenced in Plan Tucson, the City of Tucson adopted Administrative Directive No. 1.07-7, "Protection of Archaeological and Historical Resources in City Projects" in 1999. Presumably, this Administrative Directive is the basis for Policy HP-6, which provides specific language guiding mitigation of impacts from construction and excavation in COT rights-of-way on historic, cultural, and archaeological resources, but there is no equivalent language about construction and excavation on private lands within COT, nor is there mention of the Archaeological Sensitivity Zones recently developed by the Historic Preservation Office. Instead, the language concerning development on private land within the City of Tucson in HP-7 and HP-8 is non-specific and much softer, lacking direct statements about protecting historic resources. The softer language changes the focus to the economic model, as in HP-7, which looks for benefits of new development to Historic Preservation instead of requiring mitigation of impacts to archaeological and historic sites. HP-8 requires new development within Historic</p> <p>Districts to take into account the historic context of the proposed development, but there is no direct statement requiring mitigation of impacts on cultural resources from construction or excavation within private lands. The Pima County model of applying specific mitigation measures to impacts on historic properties as requirements or conditions of rezoning and permitting is more appropriate for the stated goals of Historic Preservation.</p> <p>Even when there is explicit language requiring mitigation, as in HP-6, there is no direct statement about implementation. Implementation strategies are weak, ill-defined, or non-existent throughout the document. Vague references to implementation through existing plans, specific plans, policies, etc., inadequately define opportunities for implementing existing or new policies (e.g., Administrative Directive No. 1.07-7) and instead, ignore or constrain such opportunities. The lack of specific implementation language reflects a disconnect between the stated goals, policies, and measures of success and sustainability. Implementation is a necessary, but under-represented, component of the overall discussion, exemplified by the presentation charts' lists of goals and policies that bypass implementation and go directly to measures of success and sustainability.</p>	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
150	General	Historic Preservation	Chapter 3		<p>Rather than opening new opportunities for Historic Preservation, the overall approach within the framework of Chapter 3 constrains preservation principles and limits COT's ability to take protective actions. This is most likely due to the passage of Proposition 207, which was officially titled the "Private Property Rights Protection Act," now A. R.S. 12-1134. The Act provides that "if the existing rights to use, divide, sell or possess private real property are reduced by ... any land use law enacted after the date the property is transferred to the owner and such action reduces the fair market value of the property the owner is entitled to just compensation." Consequently, the Historic Preservation discussion limits recommendations for the protection and preservation of prehistoric and historic archaeological sites by redefining cultural resources as economic assets, as in the Redevelopment and Revitalization Policies (p.3.108). The argument calls for strengthening cultural resources as assets through development without explaining how preservation goals are compatible and can be met within this framework. Alternatively, we recommend that the COT consider extending cultural resource protections as conditions of rezoning, which is a discretionary action by a jurisdiction that typically expands property owner rights and allows for intensification of land uses.</p>	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013

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#	Type of Comment	Topic	Final Draft Page or Chapter #	Final Draft Goal or Policy #	Comment	Commenter's Name	Commenter's Affiliation	Method received	Date received
151	Policies	Historic Preservation and Land Use	3.122, 3.126, 3.130 & 3.140	LT-1, LT-7, LT-26, LT-26.1.15, LT-26.1.16, & LT-26.10.4	OSC is also concerned about Plan Tucson's emphasis on annexation and target areas for development identified as Opportunity Areas (see, Exhibit L T-7, p.3.122). The Opportunity Areas map overlays Industrial Areas, Business Centers, and other land use categories on areas with known significant archaeological sites whose preservation would be best served by avoidance, incorporating the resources into open space, rather than development in place. Cultural resources protections language addressing annexed and other areas is absent, other than brief mention of the existing Historic Zoning Overlays, established in 1972. The section on Land Use, Transportation, and Urban Design (p.3.126) gives lip service to historic preservation in its Guidelines for Development Review (all locations and types), as reflected in Policy L T-1, regarding "sensitivity to historic and natural resources," and portions of Policy L T -26. Policy L T -26.1.15 calls for protection of historic and archaeological resources, and L T -26.1.16 (p. 3.130) and L T-26.1 0.4, mention preservation of COT historic architecture (P.3.140).	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
152	General	Historic Preservation and Land Use			OSC is concerned about what will happen to cultural resources (archaeological and historic sites) in annexed lands that currently are subject to County cultural resources protections and requirements for mitigation of impacts from ground-disturbing actions. There is a significant potential for substantial impacts on archaeological resources if the minimal mitigation standards established in Plan Tucson apply to unincorporated Pima County lands annexed by COT. Weakening preservation policies and cultural resources protections fails to serve cultural resources impacted by development and would negate long-term County preservation goals. OSC recommends that COT continue to meet County standards for cultural resources protections and County historic preservation policies within annexed lands.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
153	General	Implementation	4.15		Chapter 4 discusses plan implementation and administration, but fails to connect Policy with Implementation, especially concerning cultural resources protections and Historic Preservation. The Built Environment sustainability metrics and outcomes (p. 4.15) list Historic Preservation first, but the focus, again, is on historic buildings and residences. The absence of implementation discussions-nuts and bolts descriptions of how policies will be implemented-underscores the lack of connection between goals/policies and metrics/outcomes. References to existing policies, specific plans, etc., are inadequate unless supported by specific strategies for implementation.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
154	General	Water and Land Use			The City's general plan update does not address wastewater needs relative to future growth. Rather, the document relies on the joint Water and Wastewater Infrastructure, Supply, and Planning Study to address future growth of the primary potable and wastewater systems within the metropolitan area. RWRD staff has participated in the development of this document over the past 24 months by attending several meetings and workshops. In addition to participating in the development of this document, we have reviewed the final draft in its entirety and have no additional comments.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
155	Policies	Public Safety	3.25		Natural Resources, Parks and Recreation offers the following suggestions to the City of Tucson General & Sustainability Plan 2013: Renumber the last PS9 to PS10.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
156	Map	Parks and Recreation		Exhibit PR-1	Add "The Loop" to the exhibit.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
157	Map	Parks and Recreation		Exhibit PR-3	Add "river parks" acreage to the calculations.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
158	Background	Parks and Recreation	3.29		End of the first paragraph add Pima County Resources <u>Parks and Recreation</u> .	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
159	Other Table	Parks and Recreation	3.31		Under "Other Related Policies:" -Governance & Participation consider adding G9-12 -Consider adding a column for cross reference purposes where the Parks and Recreation Policy occurs in the other elements, such as Housing by adding 3, 10-12. See attached sheet.	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
160	Policy	Public Health		PH6	"Collaborate with Pima County Health Department on emergency service preparedness and to improve knowledge about and service to the many mental and physical health services offered through the Pima County Health Department." The Pima County Health Department doesn't offer mental health services. Within the county, the Office of Behavioral Health is a stand-alone unit that focuses solely on behavioral health and is not part of the Health Department, but works in conjunction with them on shared initiatives. It should read something like: "Collaborate with the Pima County Health Department on emergency service preparedness and the services available for physical health. Collaborate with the Pima County Office of Behavioral Health to improve knowledge about mental health and the services available in the community."	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013

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161	General				<p>Pima County staff hopes these comments and suggestions are useful to you. Please contact me if you would like further clarification, and we can connect you with the correct staff person regarding a specific comment or question. Also, as the County's effort on our Comprehensive Plan is just getting underway, we look forward to your assistance and participation in our planning process to coordinate and help each other build a better region together.</p> <p>Thanks again for the opportunity to comment. If it would be considered helpful, we would look forward to reviewing and making constructive comment on the upcoming Implementation Action Plan, whenever that is ready to be discussed.</p>	Arlan M. Colton, Planning Director	Pima County Development Services Department	E-mail	5/2/2013
162	General	Land Use			<p>After the last MCRC meeting, MCRC members reviewed the Final Draft for Plan Tucson and raised additional questions and concerns. These are provided for your consideration. Tucson has many established neighborhoods located under military over flight paths. It is an important element of support for DMAFB and the ANG that military facilities, government agencies, neighborhoods and community leadership stay actively engaged and committed to improving compatibility between base operations and populated areas of the Tucson metropolitan area. The MCRC understands that State Law prescribes the elements that must be included in a General Plan. MCRC requests that the City include in Plan Tucson:</p> <ul style="list-style-type: none"> • A specific statement of support for the Arroyo Chico Area Plan. • The importance of preserving and enhancing the quality of life, standard of living, health, welfare and safety of residents, businesses and guests/customers located within the 65-69 Ldn noise contour should be included in Plan Tucson. <p>The MCRC represents an important and relevant perspective on this essential planning document. We appreciate your incorporation of these comments in Plan Tucson.</p>	Alice Roe, Chair	Military Community Relations Committee	E-mail	5/1/2013
163	General				<p>We thank you for the opportunity to comment on Plan Tucson, the 2013 General Plan for the City of Tucson. This plan takes a comprehensive look at the future direction of our community over the next 10 years. Metropolitan Pima Alliance (representing 120 members), Southern Arizona Home Builders Alliance (representing 350 members), Arizona Builders Alliance (representing 450 members), Tucson Association of Realtors (representing 4,500 members), Tucson Metro Chamber (representing 1,400 members), Tucson Hispanic Chamber (representing 1,050 members), and Tucson Utility Contractors Association (representing 100 members) have a substantial impact on the economic vibrancy of our community.</p> <p>The critical role our industries play in successfully obtaining many of these shared values cannot be overstated. While our members recognize the importance of social justice and environmental issues to future sustainability, we believe it is essential for Plan Tucson to prioritize business initiatives, private investment advocacy, job creation and economic sustainability.</p> <p>The recent improvements in the development, real-estate, and housing industries and our local economy are not coincidental. As the local business market had begun to improve, the effects of such can be seen in the broader community in our region. As such, any future plan which understands and promotes this correlation will contribute greatly to ensuring many of our community values are achievable and indeed realized. Conversely, any plan which hinders development in our community has the potential for the unintended consequence of threatening many of the values outlined in the proposed Plan Tucson document.</p>	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association		Letter	5/6/2013
164	General				<p>It is imperative that Plan Tucson not only recognize the roles the development, real estate, homebuilding, and business communities will play in our future success but include specific, tangible goals and objectives ensuring commerce is valued, promoted and realized in our community; now and in the future. As the Plan is currently written, we cannot support it because there are too many inconsistencies.</p> <p>As such, we offer the following comments for your consideration:</p> <ol style="list-style-type: none"> 1. The City of Tucson should be cognizant that the current economy is extremely price sensitive. Costs of doing business should not increase without a direct, short-term benefit to the user/applicant. Business requirements by this plan add costs and only marginal benefits to the incurring party. 2. In comparison to previous General Plans adopted by the City of Tucson, this one is drastically more specific and detail oriented, which contrasts with the goal of a general plan to provided broad policy direction. 3. In general, the individual elements of this plan seem to have been put together in silos with purposes that are sometimes in competition with one another. We believe it best the Plan Tucson document be reviewed to prioritize these goals and to understand how the individual elements interact with one another and how they contribute to the overall goals as previous City of Tucson General Plans historically have done. 	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association		Letter	5/6/2013

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165	General	Economic Development & Housing			<p>4. As in previous recessions, development in the housing industry will once again lead the economic recovery necessary to realize many of the goals and objectives outlined in Plan Tucson. Removing and/or reducing any regulatory obstacles to increased development, both commercial and residential affordability will expedite our local economic recovery. We encourage this be considered and integrated where possible in the final document.</p> <p>5. Accomplishing desired growth area goals will be most successful when accompanied with proper incentives. Restrictive, inflexible growth boundaries which promote sprawl further complicate infrastructure planning, and reduce affordability of building for the commercial and residential development industries.</p>	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association		Letter	5/6/2013
166	General	Water			6. The Water Service Area Policy is not a regional planning effort for our water resources. The conflict between this policy and the regional approach called for in the plan highlight the need for a return to a policy that manages our valuable water resources without respect to municipal boundaries. The plan also suggest we should work regionally on water planning (WR7) and similarly suggest a regional approach to long and short term planning efforts (G8).	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association		Letter	5/6/2013
167	General	Land Use			7. We see serious negative consequences to the plan by suggesting the adoption of Pima County's Conservation Land System as suggested in LT20 and LT21. The inducement to annex into the City in exchange for water could be significantly weakened as there would be little difference in development policy between the City and County. It could also encourage development to move to communities like Oro Valley, Sahuarita and Marana and away from Tucson as a result of these new requirements.	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association		Letter	5/6/2013
168	General	Historic Preservation			8. The plan calls for the City to assist neighborhoods to obtain historic status (HP2). There needs to be discussion however about what areas are truly historic and how that designation impacts our community and property rights; separating out age versus architectural value of structures. Designations should not be obtained to limit certain types of development. We have already seen how historic designations placed limits on the type of development along certain sections of the modern streetcar route. Tucson must be sensitive to the necessity and limitations that these historic designations create and must balance their impact on our economy and property rights.	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association		Letter	5/6/2013

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169	Map	Land Use			9. The Opportunity Areas map must be removed from the plan. As currently drawn, the map is inaccurate, confusing, is not user friendly and may discourage future economic attraction and expansion in our region. The text regarding the map does not give clear direction for implementation. Additionally, interpretation and conflict resolution are not addressed.	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association	Letter		5/6/2013
170	General	DMAFB & Economic Development			10. The plan does not take into account the economic impact of our military bases and installations (Davis Monthan Air Force Base and the Air National Guard). DMAFB, the third largest employer in Southern Arizona, has over a billion dollar impact on our local economy and as such should be addressed separately from other areas of commerce listed in the plan.	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association	Letter		5/6/2013
171	General	General			Given the detailed nature of this document in comparison to previous City of Tucson General Plans we urge the Commission to direct staff to provide insight on how this plan varies in comparison to its predecessors in addition to which areas have been added, removed, or altered significantly. It is our concern this document has an unnecessary amount of detail and information and is no longer within the scope of being considered "general". Collectively, as representatives of thousands of local businesses and their employees, we cannot support this document without significant document changes, clarifications, and additions to genuinely support the business community and promote economic vitality and vibrancy as opposed to promoting the status quo.	Amber Smith, Metropolitan Pima Alliance; David Godlewski, SAHBA; Lea Marquez-Peterson, Tucson Hispanic Chamber of Commerce; Robert Medler, Government Relations Tucson Metro Chamber; Ramon Gaanderse, Tucson Utility Contractors Association	Letter		5/6/2013
172	Typo	Typos	Chapter 2		Planning is misspelled in header.	R. Brooks Jeffery	Drachman Institute	Web	5/6/2013
173	General	Historic Preservation			Two members of city long-range-planning staff attended the May 8, 2013, monthly meeting of the Tucson-Pima County Historical Commission per the commission's request and presented an excellent summary of the historic preservation element of the Final Draft Plan Tucson. Commissioners spent additional time after the meeting reviewing materials on the Plan Tucson website. On behalf of the commission, I would like to commend the plan for its inclusion of historic preservation as an integral part of the overall strategy to ensure Tucson's future. We also appreciate how the Tucson Historic Preservation Officer was included in planning discussions. The commission fully supports approval of the Final Draft version of Plan Tucson. Could I request that either Mr. Mazzocco or Plan Tucson planners pass along this message to the chair of the Planning Commission prior to the coming hearing on May 22, as I could not find an email address for Mr. Ladd Keith, who is listed as chair of the Planning Commission on that commission's website.	Teresita Majewski	Chair, Tucson-Pima County Historical Commission	E-mail	5/19/2013